Message

From: investhazmat@aol.com [investhazmat@aol.com]
Sent: 5/24/2017 1:55:04 AM
To: Randell, George [Randell.George@epa.gov]
CC: carl.bernhardt@waterboards.ca.gov; jean.kayano@ccaej.org
Subject: Fwd: UTAS/UTC Rohr Riverside CA - Site Characterization Report
Attachments: 2017_0428_HAI_SiteCharReport_F2.pdf

Hi Mr. Randell,

Thank you for taking the time to discuss the Report with me this morning.

I have the following concerns with the April, 2017 Report (Findings and Conclusions, page 9, 10):

1. SOIL: **The small number of samples cannot give credence to the statement that PCB concentrations decrease rapidly laterally beyond the site boundary; the statement that the objective of delineating PCBs in shallow soil within the unpaved areas of the Site was acheived is unsubstantiated (detail is not provided).**

2. GROUNDWATER: The statement that "groundwater sample results from this investigation are less than the MDL for each Aroclor (0.17ug/L for Aroclor 1242 to 0.28 ug/L for Aroclor 1016) and therefore below the California MCL for PCBs(total) of 0.5 ug/L" **is misleading and not a true statement.** The total PCBs cannot be calculated due to **improper/high Method Reporting Limits** by the Lab; **ALS Environmental indicates that that EPA Method 8082A has Aroclor Method Reporting Limits of 0.005 ug/L**
Also Method EPA 8082A documents indicate that quantification of the seven Aroclors is particularly difficult when the Aroclors have been weathered by long exposure in the environment and therefore this Method provides procedures for the determination of a selected group of the 209 possible PCB congeners.

3. SEDIMENT: The statement that "PCBs were detected in six of the ten collected within the SWCS at concentrations greater than 1 mg/kg, with higher concentrations in the vicinity of Building 27" indicates that the StormWater BMPs failed. It appears that the SWCS is not detailed in written form or by maps; also specific BMPs are not detailed in this report or the 2016 SWPPP. The statement that " SWCS sediments are currently managed through the facility's storm water maintenance program; why isn't the program attached to the Report or the SWPPP? Also, where is the PCB contaminated sediment containment and disposal documentation?

The levels of PCBs found in the sediment indicate that PCBs have discharged offsite and sediment in the Anza Channel needs to be evaluated. (Note: the Anza Channel discharges to the Santa Ana River which is a source of drinking water for Orange County).

4. INDOOR AIR: The Report says PCBs were detected a Aroclor 1248 in four indoor air samples collected in Buildings 4 and 27 in proximity to former PCB use areas which is a true statement but the statement "the PCB concentrations are less than the EPA Screening Level for industrial air of 2.1 ug/m3 at the 1xE-04 **is a false statement. The Report Appendix B Health Science Associates PCB Monitoring document page 3 states " All the indoor Environmental PCB sampling results exceeded the EPA Screening Level for Aroclor 1248." The actual Regional Carcinogenic Screening Level is 2x E-02ug/m3 which equals 0.02 ug/m3, with a Target Risk of 1xE-6 (Composite Worker Ambient Table, May, 2016).**

The Aroclor levels indicate that both Buildings 4 and 27 are contaminated with PCBs and the

floors, walls,
ceiling and equipment inside the buildings require wipe samples to determine the type of decontamination or
removal that maybe needed.

Also, during our phone conversation I brought up the issues of the PCB contaminated sewer pipes that may be in service or abandoned between Rohr/UTC and the Riverside AG Park & the main storm drain offsite of Rohr/UTC is actually the Anza Channel which is a concrete canal with weep holes due to the high groundwater which is contaminated by Rohr/UTC.
Lastly, a detailed Rohr/UTC sewer pipe line/drain diagram and stormwater conveyance system diagram(including drains) for each building and the general property has never been submitted for review.

If you have any questions, please contact me at 909-709-3180.
Thank you for your time.

Sincerely,

Bruce Bailey

-----Original Message-----
From: investhazmat <investhazmat@aol.com>"
To: carl.bernhardt <carl.bernhardt@waterboards.ca.gov>
Sent: Tue, May 23, 2017 8:58 am
Subject: Fwd: UTAS/UTC Rohr Riverside CA - Site Characterization Report

Dear Mr. Bernhardt,

I have forwarded the e-mail and attached April, 2017 Report for your review.
Could you place the attached report on the Geotracker activities page?

Also, could you detail your role on the soil clean-up effort? Do you officially review all soil cleanup documents and make comments/recommendations or state requirements at the Rohr/UTC facility? Does Rohr/UTC/Haley Aldrich send you PCB characterization/cleanup documents for review and comment?; if not why?

Please verify receipt with an e-mail reply. Thanks.

Sincerely,

Bruce Bailey

-----Original Message-----
From: Randell, George <Randell.George@epa.gov>
To: investhazmat <investhazmat@aol.com>
Sent: Mon, May 22, 2017 8:27 am
Subject: FW: UTAS/UTC Rohr Riverside CA - Site Characterization Report

Hello and good Morning Bruce. Here is a copy of the Characterization report. To my understating this is just a report showing the characterization results. We will be having meetings in the future to discuss the possible remediation efforts to take place on site. I look forward to our call tomorrow.

Thank you

George Randell
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